

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

**IN RE:**

<b>ELIZABETH HILL,</b>	:	<b>Chapter 13</b>
<b>EDWARD HILL,</b>	:	
<b>Debtor</b>	:	<b>Bankruptcy No: 15-14914</b>

**MOTION TO CONVERT FROM CHAPTER 13 CASE  
TO CASE UNDER CHAPTER 7**

**COMES NOW**, the Debtors Elizabeth and Edward Hill who file this motion to convert from a Chapter 13 to a Chapter 7 and in support thereof, says:

1. The Debtors are Elizabeth and Edward Hill.
2. The Debtors filed a petition for protection pursuant to Chapter 13 of the Bankruptcy Act 11 U.S.C. § 101 et. seq.
3. The Debtor had been able to make her plan payments so long as her husband lived and she had his support.
4. The Debtor's husband died on or about April 7, 2016 and solely as a result of his death, the debtor is no longer able to make her plan payments.

**WHEREFORE**, the Debtors, **Elizabeth and Edward Hill**, pray this Honorable Court to:

- A. Grant relief in accordance with Chapter 7 of the Bankruptcy Code; and
- B. Grant such other relief as this Court deems fitting and just.

Dated: 11/29/2017

/s/Joseph Bambrick  
**Joseph T. Bambrick, Jr., Esquire**  
Attorney for Debtor  
Bar No. 45112  
529 Reading Avenue, Suite K  
West Reading, PA 19611

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

**IN RE:**

**ELIZABETH HILL,  
EDWARD HILL,  
Debtor**

**: Chapter 13  
:  
: Bankruptcy No: 15-14914**

**ORDER**

**AND NOW**, the Debtor's Motion to Convert From a Chapter 13 Case to a Chapter 7 Case is  
**GRANTED.**

**BY THE COURT,**

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**Richard E. Fehling,  
U.S. BANKRUPTCY JUDGE**

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<b>EDWARD HILL,</b>	:	
<b>Debtor</b>	:	<b>Bankruptcy No: 15-14914</b>

**CERTIFICATE OF SERVICE**

I, Tiffany Dease, Paralegal for the law firm of Joseph T. Bambrick, Jr., Esquire, hereby certify that I mailed a filed copy of the Debtor's **Motion to Convert Case**, via First Class Mail, postage prepaid, this 29<sup>th</sup> day of November, 2017 to the following:

**CHAPTER 13 TRUSTEE**

Frederick Reigle, Esq.  
Via ECF: [ecfmail@fredreiglech13.com](mailto:ecfmail@fredreiglech13.com)

**UNITED STATES TRUSTEE**

U.S. Trustee's Office  
Via ECF: [USTPRegion03.PH.ECF@usdoj.gov](mailto:USTPRegion03.PH.ECF@usdoj.gov)

**DEBTOR**

Elizabeth and Edward Hill  
4344 New Holland Road  
Mohnton, PA 19540

**CREDITORS**

See attached list.

/s/Tiffany Dease

Tiffany Dease

Bank of New York Nationstar  
Mortgage  
PO Box 619098  
Dallas, TX 75261

Capital One Bank  
PO Box 30281  
Salt Lake City, UT 84130

Children's Place  
PO Box 6497  
Sioux Falls, SD 57117

Citibank, N.A.  
701 East Falls 60th St. North  
Sioux Falls, SD 57117

Citiflex/ Citibank  
PO Box 6497  
Sioux Falls, SD 57117

Comenity Bank/ Bonton  
PO Box 182789  
Columbus, OH 43218

Diamond credit Union  
1600 Medicare Drive  
Pottstown, PA 19464

Kohls  
PO Box 3115  
Milwaukee, WI 53201

Medical Reading Dermatology  
2208 Quarry Drive  
Reading, PA 19609

Midland Funding LLC  
P.O. Box 2011  
Warren, MI 48090

National Bank of Omaha  
PO Box 3412  
Omaha, NE 68103

Physician Billing Office  
PO Box 102388  
Atlanta, GA 30368

Portfolio Recovery Associates,  
LLC  
P.O. Box 41067  
Norfolk, VA 23541

Syncb/Nations  
PO Box 965036  
Orlando, FL 32896

Syncb/Sams Club  
PO Box 965036  
Orlando, FL 32896

US Postal Service FCU  
7905 Malcolm Road, 4th Floor  
Clinton, MD 20735

Vativ Recovery Solutions  
PO Box 40728  
Houston, TX 77240